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Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

TAMARA GEIST, an individual,

Plaintiff,

vs.

WAL-MART ASSOCIATES, INC., a Delaware  
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:24-cv-01298-TLN-AC

**JOINT STIPULATION AND ORDER TO  
CONTINUE PRETRIAL DATES**

Action Filed:  
Trial Date:

May 6, 2024  
None Set

1 Plaintiff TAMARA GEIST (“Plaintiff”) and Defendant WAL-MART ASSOCIATES, INC.  
2 (“Defendant”), by and through their counsel, hereby stipulate and agree as follows:

3 WHEREAS, Plaintiff conducted a Rule 30(b)(6) deposition on July 23, 2025;

4 WHEREAS, the Parties’ deadline to complete fact discovery is September 2, 2025;

5 WHEREAS, the Parties identified additional documents to be produced by Defendant in lieu  
6 of additional Rule 30 (b)(6) depositions during their meet and confer efforts on August 1, 2025;

7 WHEREAS, the Parties agreed to an additional document production for Matters of  
8 Examination Nos. 13 and 14 by Defendant in lieu of additional Rule 30 (b)(6) depositions on August  
9 14, 2025;

10 WHEREAS, the Parties met and conferred on the scope of the additional documents  
11 responsive to Matter of Examination No. 2 on August 18, 2025;

12 WHEREAS, Defendant requires additional time to produce the documents identified through  
13 the Parties’ meet and confer efforts to date and will produce documents no later than November 3,  
14 2025;

15 WHEREAS, Defendant has not yet received medical records subpoenaed from Plaintiff’s  
16 healthcare providers and has not had the opportunity to evaluate whether Plaintiff’s healthcare  
17 provider depositions are necessary;

18 WHEREAS, the Parties are making this request as soon as reasonably practicable once the  
19 Parties realized the necessity of the extension based on productive meet and confer efforts regarding  
20 Plaintiff’s request for further information following Defendant’s Rule 30(b)(6) deposition and  
21 Defendant’s need to review Plaintiff’s medical records and potentially depose Plaintiff’s healthcare  
22 provider(s);

23 WHEREAS, both Parties will suffer significant prejudice if the fact discovery deadline is  
24 not extended for the limited purposes outlined above;

25 WHEREAS, the Parties agree that neither Party will suffer any prejudice if the Court  
26 extends the fact discovery deadline for the limited purposes outlined above;

27 WHEREAS, the Parties agree that the interests of justice are best served by *an extension of*  
28 *the fact discovery deadline for the limited purposes of Plaintiff’s request for further information*

*following Defendant's Rule 30(b)(6) deposition and Defendant's review of Plaintiff's medical records and potential deposition(s) of Plaintiff's healthcare providers;*

**THEREFORE**, for the reasons set forth above, good cause exists for an extension of the September 2, 2025 fact discovery deadline to November 3, 2025. Defendant will produce responsive documents no later than November 3, 2025 and Plaintiff will have 21 days following the 60-day document production deadline to meet and confer with Defendant and / or request an Informal Discovery Conference. Subject to the Court's approval the Parties stipulate and agree to the proposed revised deadlines below:

Event	Current Date	Proposed Date
Fact discovery cutoff for the purpose of the document production related to the Rule 30(b)(6) Deposition of Defendant and Defendant obtaining medical records and potentially deposing Plaintiff's healthcare providers.	September 2, 2025	November 3, 2025
Plaintiff shall have until November 25, 2025 to meet and confer on Defendant's document production and request an Informal Discovery Conference with the Court if necessary.	September 2, 2025	November 25, 2025

1           **IT IS SO STIPULATED.**

2  
3           DATED: September 2, 2025

EXCELSIS LAW, P.C.

4  
5                           By: /s/ Zainah Alfi  
6                                 C. Genevieve Jenkins  
7                                 Zainah Alfi

8                           Attorneys for Plaintiff  
9                           TAMARA GEIST

10  
11           DATED: September 2, 2025

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

12  
13  
14                           By: /s/ James T. Conley  
15                                 James T. Conley  
16                                 Michele J. Bongiovanni  
17                                 Sandra Benlevy

18                           Attorneys for Defendant  
19                           WAL-MART ASSOCIATES, INC.

20                           **SIGNATURE ATTESTATION**

21           I attest that I have obtained concurrence in the filing of this document from the other  
22   signatories in compliance with Local Rule 131(e).

23  
24           Date: September 2, 2025

By: /s/ James T. Conley  
James T. Conley

**ORDER**

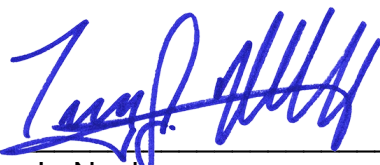
The Court having read and considered the Parties' Joint Stipulation to Continue Pretrial Dates, and good cause appearing:

IT IS HEREBY ORDERED that the pretrial dates shall be as follows:

Event	Current Date	Proposed Date
Fact discovery cutoff for the purpose of the document production related to the Rule 30(b)(6) deposition of Defendant and Defendant obtaining medical records and potentially deposing Plaintiff's healthcare providers.	September 2, 2025	November 3, 2025
Plaintiff shall have until November 25, 2025 to meet and confer on Defendant's document production and request an Informal Discovery Conference with the Court if necessary.	September 2, 2025	November 25, 2025

**IT IS SO ORDERED.**

Dated: September 2, 2025

  
\_\_\_\_\_  
Troy L. Nunley  
Chief United States District Judge